

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:

Kristin M. Stafford  
Daniel J. Stafford

Debtor(s)

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Case No.: 20-10251(AMC)

Chapter 13

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtors, Kristin and Daniel Stafford, by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about January 14, 2020.
2. The Chapter 13 filing was assigned case number 20-10251(AMC).
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about July 15, 2020.
4. On or about August 19, 2020, the Internal Revenue Service (IRS) filed an amended proof of claim.
5. Additionally, Debtors believe it is in their best financial interest to surrender the 2013 Cadillac XTS, which is currently being paid inside the confirmed plan, to the creditor.
6. The Debtors therefore request to modify the confirmed Chapter 13 Plan, to include the amended claim filed by the Internal Revenue Service and to surrender the Cadillac to the creditor.

7. In furtherance of the Debtors including the IRS's amended claim in their plan and surrendering the 2013 Cadillac XTS, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

8. The Debtors' proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", includes the Internal Revenue Service's proof of claim and is deemed affordable by the Debtors.

**WHEREFORE**, the Debtors request that they be permitted to modify their Chapter 13 Plan for the above-stated reasons.

Dated: September 23, 2020

/s/Brad J. Sadek, Esq.  
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